



Corporate Environmental Programs  
General Electric Company  
100 Woodlawn Avenue, Pittsfield, MA 01201

*Transmitted Via Overnight Delivery*

October 21, 2004

Mr. William P. Lovely, Jr.  
U.S. Environmental Protection Agency  
EPA New England (MC HBO)  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Floodplain Residential and Non-Residential Properties Adjacent to 1½ Mile Reach of  
Housatonic River (GECD710 and GECD720)  
Interim Pre-Design Investigation Report Addendum for Phase 3 Floodplain Properties,  
Groups 3A, 3B, 3C, and 3D**

Dear Mr. Lovely:

On August 13, 2004, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) an *Interim Pre-Design Investigation Report for Phase 3 Floodplain Properties* (Interim PDI Report), which addressed soil investigations at the properties located adjacent to the 1½ Mile Reach of the Housatonic River that are considered to be in Phase 3 of response actions for such floodplain properties. Later in August 2004, GE conducted supplemental investigations of polychlorinated biphenyls (PCBs) in soil at some of these properties. In addition, based on subsequent discussions between GE and EPA, GE has made a number of modifications to the proposals set forth in the Interim PDI Report. GE is submitting this Addendum to present the results of the August 2004 supplemental PCB investigations and to document GE's revised proposals for the appropriate evaluation areas and for additional investigations for PCBs and other constituents at these properties.

## **1. Summary of Recent PCB Soil Investigations**

Between August 19 and August 24, 2004, GE conducted supplemental PCB investigations within and adjacent to certain Phase 3 floodplain properties. The supplemental PCB investigations were conducted in accordance with an August 3, 2004 document titled *Proposal for Supplemental PCB Pre-Design Investigations – Phase 3 Floodplain Properties, Groups 3A, 3B, 3C, and 3D* (Supplemental PCB Proposal). EPA conditionally approved the proposed supplemental PCB investigations in a letter to GE dated August 12, 2004.

The August 2004 supplemental PCB sampling included the collection 28 samples from 24 locations for PCB analysis. Consistent with previous pre-design investigations conducted by GE at the Phase 3 floodplain properties, the supplemental PCB investigations were performed in accordance with GE's approved *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP). The analytical results collected during supplemental PCB investigations are presented in Table 1 and have been incorporated into Figures 1 through 4. Boring logs for each supplemental location are presented in Appendix A.



The supplemental pre-design PCB analytical data have undergone data review and validation in accordance with Section 7.5 of the FSP/QAPP, and the results of this data validation are presented in Appendix B. As discussed in that report, 100% of the GE supplemental PCB pre-design data collected in August 2004 are considered to be useable.

## **2. Revision of Evaluation Areas**

Based on discussions with EPA, GE has revised the evaluation/averaging areas at the Phase 3 floodplain properties in accordance with agreements between GE and EPA. The revised evaluation areas are shown on Figures 1 through 8.

## **3. Summary of Proposed Additional Supplemental PCB Soil Investigations**

Based on review of the results of the August 2004 supplemental PCB investigation, in combination with additional PCB data that were collected by EPA from the riverbanks and were not previously considered in developing the scope of the pre-design investigations, GE has identified a number of additional PCB data needs to further assess the presence of PCBs in soil at the Phase 3 properties. To satisfy these data needs, GE proposes to conduct additional supplemental PCB sampling at the locations and depths listed in Table 2. In total, GE proposes to collect 64 samples from 19 locations within 11 evaluation areas. Of these 64 samples, 29 will be analyzed for PCBs and the remaining 35 samples will be held for possible future PCB analysis contingent upon the results of analyzed samples. The proposed PCB sample locations for each of the Group 3A, 3B, 3C, and 3D properties are shown on Figures 1 through 4, along with the locations of all existing PCB samples and the PCB data from those existing samples.

## **4. Summary of Proposed Non-PCB Soil Investigations**

GE has also evaluated modifications to the scope of sampling for non-PCB constituents listed in Appendix IX of 40 CFR Part 264, plus three additional constituents (benzidine, 2-chlorethyl vinyl ether, and 1,2-diphenylhydrazine) (Appendix IX+3). These revised evaluations have included several tasks.

First, GE has conducted revised preliminary evaluations of the PCB data, incorporating the additional riverbank PCB data collected by EPA that were not previously considered, as well as the August 2004 supplemental PCB sampling results, and using the revised evaluation/averaging areas described above. In the absence of detailed site mapping (needed to support a spatial averaging approach), these revised preliminary evaluations utilized arithmetic averages of the PCB data for the relevant depth increments in the revised evaluation areas, so as to identify the evaluation areas where remediation may be necessary to address PCBs and thus where sampling for other Appendix IX+3 constituents is warranted.

Second, GE has identified certain changes to the previously proposed non-PCB sampling locations based on the revised evaluation/averaging areas and the need to collect sufficient non-PCB data to characterize each such area that may be subject to PCB remediation.

Third, based on discussions with EPA, GE has agreed to expand the scope of the previously proposed Appendix IX+3 sampling activities to include the collection of non-PCB samples to roughly the same depth interval to be used during the evaluation of PCBs. For example, if a review of existing PCB data within an evaluation area indicates that PCBs are generally present to a depth of approximately 6 feet and thus should be evaluated to that depth, GE is proposing to collect non-PCB samples within that evaluation area to approximately the same depth (except at evaluation areas that are not anticipated to require PCB remediation).



To facilitate this evaluation, GE reviewed the available PCB data on an area-by-area basis and developed, for each area, an "X" value (in feet below the ground surface) to represent the anticipated depth to be used during PCB evaluations. Based on discussions with EPA, for each evaluation area, GE has selected a single depth as "X," to be applied across the entire evaluation area, to simplify the selection of depths for non-PCB sampling and for the performance of future Removal Design/Removal Action (RD/RA) evaluations. As further discussed with EPA, for each area, the "X" depth was selected to include all or the great majority of detected PCB concentrations in the soil. GE's proposed determination of the "X" depth for each evaluation area, along with the supporting rationale, is provided in Table 3. (This table includes all evaluation areas with PCB data, even though some of them will not require PCB remediation and thus will not be subject to sampling for non-PCB constituents.)

Once the determination of "X" was made for each evaluation area, sample depth intervals for non-PCB samples were selected for each evaluation area where PCB remediation may be necessary. Consistent with the non-PCB sampling proposed in the Interim PDI Report, these depth intervals include the 0- to 1-foot depth increment at each of the proposed non-PCB sample locations. Subsurface sample locations/depths were then selected to characterize the entire evaluation area (to the extent possible) to a depth approximately equal to "X."

Based on these evaluations, GE has developed a modified scope of sampling for non-PCB Appendix IX+3 constituents. The proposed non-PCB sample locations and associated depth increments identified by GE are summarized in Table 4. In total, GE proposes to collect 143 samples from 76 locations within 23 evaluation areas. Of these 143 samples, 137 will be analyzed and the remaining six will be held for possible future analysis depending on the results of additional supplemental PCB investigations and a further understanding of potential PCB-related remediation. The proposed non-PCB sample locations for each of the Group 3A, 3B, 3C, and 3D properties are shown on Figures 5 through 8, respectively. This modified scope of non-PCB investigations supersedes the scope presented in the Interim PDI Report.

Consistent with the Appendix IX+3 sampling proposed in the Interim PDI Report, GE proposes to submit these samples for analyses of Appendix IX+3 semi-volatile organic compounds (SVOCs), inorganics, and polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (PCDDs/PCDFs). Based on review of the existing Appendix IX+3 data from the Site, GE does not believe it is necessary to analyze these samples for volatile organic compounds (VOCs), pesticides, or herbicides.

## **5. Future Activities and Proposed Schedule**

To expedite the additional investigation activities proposed herein and to facilitate coordination with EPA's sediment and bank soil removal activities being conducted as part of the 1½ Mile Reach Removal Action, GE proposes to perform the proposed additional investigations at these floodplain properties and to submit reports thereon in two stages. GE proposes to complete the proposed additional investigations and submit a Second Interim Pre-Design Investigation Report on the properties in Groups 3A and 3B within 3 months from EPA's approval of this Addendum, and to complete the proposed additional investigations and submit a Second Interim Pre-Design Investigation Report on the properties in Groups 3C and 3D within 5 months from EPA's approval of this Addendum. Both of these proposed timetables are subject to potential weather constraints and assume that no new issues will be raised by the property owners affecting access to the properties for sampling. Each of these Second Interim Pre-Design Investigation Reports will include an evaluation of the need for additional sampling for PCBs and/or other constituents at the property groups in question and, if warranted, a proposal for such additional sampling, and it will present a proposed schedule for subsequent activities at those groups.

Please contact Dick Gates or me with any questions.

Sincerely,



Andrew T. Silfer, P.E.  
GE Project Coordinator

Attachments

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Rod McLaren, GE\*  
James Nuss, BBL  
James Bieke, Goodwin Procter  
Public Information Repositories  
GE Internal Repository  
Affected Property Owners

*\* cover letter only*



## ***Tables***

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**TABLE 1  
SUMMARY OF SUPPLEMENTAL PCB SAMPLING RESULTS**

**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES  
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO THE 1-1/2 MILE REACH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Sample ID	Depth(Feet)	Date Collected	Aroclor-1016, -1221, -1232, -1242, -1248	Aroclor-1254	Aroclor-1260	Total PCBs
<b>Surface Samples</b>						
3A-SS-20	0-1	8/19/2004	ND(0.040)	0.069	0.24	0.309
3A-SS-21	0-1	8/19/2004	ND(19)	ND(19)	130	130
3A-SS-22	0-1	8/19/2004	ND(0.80) [ND(0.81)]	2.4 [3.4]	5.8 [8.4]	8.2 [11.8]
3A-SS-23	0-1	8/19/2004	ND(0.044)	0.29	0.77	1.06
3C-SS-33	0-1	8/19/2004	ND(0.38)	7.4	10	17.4
3C-SS-34	0-1	8/19/2004	ND(0.039)	0.61	1.0	1.61
3C-SS-35	0-1	8/19/2004	ND(0.039)	0.82	1.4	2.22
3C-SS-36	0-1	8/20/2004	ND(0.039)	0.046	0.16	0.206
3C-SS-38	0-1	8/20/2004	ND(0.039)	0.12	0.40	0.52
3D-SS-21	0-1	8/19/2004	ND(0.19)	1.4	2.1	3.5
3D-SS-22	0-1	8/19/2004	ND(0.040)	0.046	0.047	0.093
<b>Soil Boring Samples</b>						
3A-SB-27	2-4	8/23/2004	ND(0.40)	3.8	6.7	10.5
3A-SB-28	1-2	8/23/2004	ND(0.20)	ND(0.20)	2.6	2.6
	2-4	8/23/2004	ND(0.20)	1.6	1.9	3.5
3A-SB-29	1-2	8/23/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
3A-SB-30	2-4	8/23/2004	ND(0.040)	0.20	0.35	0.55
	4-6	8/23/2004	ND(0.037)	0.38	0.64	1.02
3B-SB-26	6-8	8/24/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
3B-SB-27	3-4	8/24/2004	ND(0.042) [ND(0.042)]	ND(0.042) [ND(0.042)]	ND(0.042) [ND(0.042)]	ND(0.042) [ND(0.042)]
	4-6	8/24/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)
	6-8	8/24/2004	ND(0.039)	ND(0.039)	0.12	0.12
3B-SB-28	2-3	8/24/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)
3B-SB-29	2-3	8/24/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
3B-SB-31	6-8	8/24/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
3C-SB-27	2-4	8/23/2004	ND(0.23)	4.7	6.9	11.6
3C-SB-28	2-4	8/23/2004	ND(3.4)	20	27	47
3C-SB-29	6-8	8/23/2004	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)
3D-SB-25	1-2	8/24/2004	ND(0.040)	0.15	0.19	0.34

**Notes:**

1. Samples were collected by Blasland Bouck & Lee, Inc., and submitted to SGS Environmental Services, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. Field duplicate sample results are presented in brackets.
4. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan, General Electric Company, Pittsfield, Massachusetts, Blasland Bouck & Lee, Inc. (approved November 4, 2002 and resubmitted December 10, 2002).



**TABLE 2  
SUMMARY OF PROPOSED ADDITIONAL PCB SOIL INVESTIGATIONS**

**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES  
FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

PARCEL ID	SAMPLE ID	DEPTH INCREMENT (FEET)				
		0-1	1-2	2-4	4-6	6-8
GROUP 3A						
I7-2-30	3A-SB-31	--	Y	Y	Y	Y
I7-2-30	3A-SB-32	--	X	X	Y	Y
I7-2-30	3A-SB-33	--	X	X	Y	Y
I7-2-30	3A-SB-34	--	X	X	Y	Y
I7-2-26	3A-SB-35	--	Y	X	Y	Y
I7-2-30	3A-SB-36	X	Y	Y	Y	Y
I7-2-30	3A-SB-37	X	Y	Y	Y	Y
I7-2-44	3A-SB-38	--	--	X	X	Y
GROUP 3B						
I7-3-7	3B-SB-32	--	--	X	X	Y
I7-3-7	3B-SB-33	--	--	X	X	Y
I7-3-6	3B-SB-34	--	--	X	X	Y
GROUP 3C						
I7-2-20	3C-SB-27	--	--	--	X	Y
I7-2-20	3C-SB-28	--	--	--	X	Y
I7-2-5	3C-SB-30	--	--	X	Y	Y
I7-2-5	3C-SB-31	--	--	X	Y	Y
I7-2-19	3C-SB-32 <sup>1</sup>	X	X	X	Y	Y
I7-2-1	3C-SB-33	--	--	X	X	Y
GROUP 3D						
I7-3-2	3D-SS-23	X	--	--	--	--
I7-99-000	3D-SB-26	--	--	X	X	Y

Notes:

1. Analyze 0- to 1-foot and 1- to 2-foot depth increments due to elevated detection limits observed in EPA START data collected on Parcel I7-2-19.
2. X - Indicates proposed sampling depth for samples to be analyzed for PCBs.
3. Y - Indicates proposed sampling depth for samples to be held for possible future PCB analysis contingent upon the results of analyzed samples.
4. Proposed sample locations are shown on Figures 1 through 4.

**TABLE 3**  
**PROPOSED "X" VALUES FOR RD/RA EVALUATION AND ASSOCIATED RATIONALE**

**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES**  
**FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

PARCEL ID	PROPOSED "X" DEPTH FOR RD/RA EVALUATION (ft. bgs)	SUPPORTING RATIONALE
<b>GROUP 3A</b>		
17-2-26	6"  (* Subject to change based on the results of additional PCB sampling within this area.)	7 of 24 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 32.2 ppm (detected along the riverbank).  One PCB analytical result exists below 6 feet within this evaluation area. PCBs were detected at a concentration of 0.036 ppm in a sample collected from the 6- to 8-foot depth increment at location 3A-SB-22. GE does not believe that this result warrants extending "X" below 6 feet.
17-2-30 (back)	To Be Determined	PCB investigations are ongoing within this evaluation area.
17-2-31	6	5 of 14 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from 0.02 ppm (estimated value) to 14 ppm (detected along the riverbank).  One PCB analytical result exists below 6 feet within this evaluation area. PCBs were detected at a concentration of 0.036 ppm in a sample collected from the 6- to 8-foot depth increment at location 3A-SB-22. GE does not believe that this result warrants extending "X" below 6 feet.
17-2-32	6	7 of 13 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 79 ppm (detected along the riverbank).  One PCB analytical result exists below 6 feet within this evaluation area. PCBs were not detected in the 6- to 8-foot sample collected at location 3A-SB-19.
17-2-33	6	6 of 11 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 64 ppm (detected along the riverbank).  Two PCB analytical results exist below 6 feet within this evaluation area. PCBs were not detected in either of the 6- to 8-foot samples collected at locations 3A-SB-17 or 3A-SB-26.
17-2-35 (front)	2	PCBs were not detected within this evaluation area below 2 feet.
17-2-35 (back)	6	6 of 14 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 10 ppm (detected along the riverbank).  One PCB analytical result exists below 6 feet within this evaluation area. PCBs were not detected in the 6- to 8-foot sample collected at location 3A-SB-15.



**TABLE 3**  
**PROPOSED "X" VALUES FOR RD/RA EVALUATION AND ASSOCIATED RATIONALE**

**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES**  
**FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

PARCEL ID	PROPOSED "X" DEPTH FOR RD/RA EVALUATION (ft. bgs)	SUPPORTING RATIONALE
<b>GROUP 3A (continued)</b>		
I7-2-36 (front)	Not Applicable	This evaluation area will not be subject to RD/RA evaluations because PCBs were not detected in any sample.
I7-2-36 (back)	6	5 of 13 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 10 ppm (detected along the riverbank).  PCBs were not detected below 4 feet in samples collected within the evaluation area (i.e., upgradient from the top-of-bank).
I7-2-44	6*  (* Subject to change based on the results of additional PCB sampling within this area.)	To date, 3 of 21 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 29 ppm (detected along the riverbank).  PCBs were not detected below 4 feet in samples collected within the evaluation area (i.e., upgradient from the top-of-bank).
I7-2-45	6	4 of 11 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 8.97 ppm (detected along the riverbank). There are no deeper samples.
I7-2-46	6	PCB analytical results below 2 feet do not exist within this evaluation area; however, PCBs were detected in soil borings located adjacent to the evaluation area to a depth of 6 feet.
<b>GROUP 3B</b>		
I7-3-4	6	5 of 25 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 222 ppm (detected along the riverbank).  One PCB analytical result exists below 6 feet within this evaluation area (i.e., upgradient from the top-of-bank). PCBs were detected in the 6- to 8-foot sample collected at location 3B-SB-27 at a concentration of 0.12 ppm. GE does not believe that this result warrants extending "X" below 6 feet.
I7-3-5	6	10 of 28 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 15 ppm (detected along the riverbank).  PCBs were not detected below 4 feet in samples collected within the evaluation area (i.e., upgradient from the top-of-bank).
I7-3-6 (front)	1	PCBs were not detected below 1 foot within this evaluation area.

**TABLE 3**  
**PROPOSED "X" VALUES FOR RD/RA EVALUATION AND ASSOCIATED RATIONALE**

**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES**  
**FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

PARCEL ID	PROPOSED "X" DEPTH FOR RD/RA EVALUATION (ft. bgs)	SUPPORTING RATIONALE
<b>GROUP 3B (continued)</b>		
I7-3-6 (back)	6"  (* Subject to change based on the results of additional PCB sampling within this area.)	9 of 26 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 340 ppm (detected along the riverbank).  Three PCB analytical results exist at depths deeper than 6 feet within this evaluation area. PCBs were not detected in the 6- to 8-foot sample collected at location 3B-SB-31. PCBs analytical results for samples collected from the 6- to 8-foot and 8- to 10-foot depth increments at location 3B-SB-14 are 4.4 ppm and non-detect, respectively. GE does not believe that these results warrant extending "X" below 6 feet.
I7-3-7 (front)	2	PCBs were detected within this evaluation area to a depth of 2 feet.
I7-3-7 (back)	6"  (* Subject to change based on the results of additional PCB sampling within this area.)	11 of 28 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 31 ppm (detected along the top-of-bank).  Three PCB analytical results exist at depths deeper than 6 feet within this evaluation area. PCBs were not detected in the 6- to 8-foot sample collected at location 3B-SB-5. PCBs analytical results for samples collected from the 6- to 8-foot and 8- to 10-foot depth increments at location 3B-SB-10 are 0.12 ppm and non-detect, respectively. GE does not believe that the former result warrants extending "X" below 6 feet.
I7-3-8	2	PCBs were not detected below 2 feet within this evaluation area.
I7-3-9	2	PCBs were not detected below 2 feet within this evaluation area.
I7-3-10	5	4 of 14 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 4.5 feet. Sample results within the 4- to 5-foot depth increment range from non-detect to 8.9 ppm (detected along the top-of-bank).  PCBs were not detected below 4 feet in samples collected within the evaluation area (i.e., upgradient from the top-of-bank).
I7-3-11	6	2 of 12 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 1.4 ppm (detected along the top-of-bank).  PCBs were not detected below 3 feet in samples collected within the evaluation area (i.e., upgradient from the top-of-bank).



**TABLE 3**  
**PROPOSED "X" VALUES FOR RD/RA EVALUATION AND ASSOCIATED RATIONALE**

**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES**  
**FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

PARCEL ID	PROPOSED "X" DEPTH FOR RD/RA EVALUATION (ft. bgs)	SUPPORTING RATIONALE
<b>GROUP 3C</b>		
17-2-1	6"  (* Subject to change based on the results of additional PCB sampling within this area.)	9 of 29 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 34.3 ppm (1.98 ppm in duplicate sample).  Two PCB analytical results exist below 6 feet within this evaluation area. PCBs were not detected in either of the 6- to 8-foot samples collected at locations 3C-SB-25 or 3C-SB-26.
17-2-2	2	In general, PCBs were detected within this evaluation area to a depth of 2 feet.  PCB analytical results below 2 feet exist at one location within this evaluation area. PCB analytical results collected from the 2- to 4-foot and 4- to 6-foot depth increments at location 3C-SB-21 are 0.029 ppm and non-detect, respectively. GE does not believe that the former result warrants extending "X" below 2 feet.
17-2-3	4	10 of 10 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 4 feet. Sample results within the 3- to 4-foot depth increment range from non-detect to 1.78 ppm (1.4 ppm in duplicate sample).  Three PCB analytical results exist at depths deeper than 4 feet within this evaluation area. PCBs were not detected in the 4- to 6-foot sample collected at location 3C-SB-16. PCBs analytical results for samples collected from the 4- to 6-foot and 6- to 8-foot depth increments at location 3C-SB-20 are 1.29 ppm and 0.091 ppm, respectively. GE does not believe that these results warrant extending "X" below 4 feet.
17-2-4	2	In general, PCBs were detected within this evaluation area to a depth of 2 feet.  Four PCB analytical results exist below 2 feet within this evaluation area. PCBs were detected in one of these four samples at a concentration of 0.29 ppm. GE does not believe that this result warrants extending "X" below 2 feet.
17-2-20	8"  (* Subject to change based on the results of additional PCB sampling within this area.)	7 of 30 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 8 feet. Sample results within the 7- to 8-foot depth increment range from non-detect to 2.7 ppm.  Two PCB analytical results exist below 8 feet within this evaluation area. PCBs were detected in one of these samples at a concentration of 0.087 ppm. GE does not believe that these results warrant extending "X" below 8 feet.

**TABLE 3**  
**PROPOSED "X" VALUES FOR RD/RA EVALUATION AND ASSOCIATED RATIONALE**

**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES**  
**FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

PARCEL ID	PROPOSED "X" DEPTH FOR RD/RA EVALUATION (ft. bgs)	SUPPORTING RATIONALE
<b>GROUP 3D</b>		
I7-3-1 (front)	2	PCBs were not detected below 2 feet in samples collected within the evaluation area.
I7-3-1 (back)	6	<p>10 of 30 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 19.4 ppm (13 ppm in duplicate sample) (detected along the riverbank).</p> <p>One PCB analytical result exists below 6 feet within this evaluation area. PCBs were not detected in the 6- to 8-foot sample collected at location 3D-SB-13.</p>
I7-99-000 (front)	Not Applicable	This evaluation area will not be subject to RD/RA evaluations because PCBs were not detected above 1 ppm in any sample.
I7-99-000 (back)	6*  (* Subject to change based on the results of additional PCB sampling within this area.)	<p>10 of 37 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 20.6 ppm (detected along the riverbank).</p> <p>Three PCB analytical results exist below 6 feet within this evaluation area. PCBs were not detected in the 6- to 8-foot sample collected at location 3D-SB-10. PCBs analytical results for samples collected from the 6- to 8-foot and 8- to 10-foot depth increments at location 3D-SB-9 are 0.128 ppm and 0.118 ppm, respectively. GE does not believe that these results warrant extending "X" below 6 feet.</p>
I7-3-2	6	5 of 27 soil boring locations (i.e., locations sampled deeper than 2 feet) extend to a depth of at least 5.5 feet. Sample results within the 5- to 6-foot depth increment range from non-detect to 2.18 ppm (detected along the riverbank). There are no deeper samples.

**TABLE 4**  
**SUMMARY OF PROPOSED APPENDIX IX+3 SAMPLING LOCATIONS AND ASSOCIATED DEPTH INTERVALS**  
**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES**  
**FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SAMPLE ID	PARCEL	DEPTH INCREMENT (FEET)			
		0-1	1-3	3-5	5-7
GROUP 3A					
3A-A9-1	17-2-26	X	X	--	--
3A-A9-2		X	--	X	--
3A-A9-3		X	X	--	--
3A-A9-4	17-2-30 <sup>5</sup>	X	--	--	--
3A-A9-5		X	--	--	--
3A-A9-6		X	--	--	--
3A-A9-7	17-2-31	X	X	--	--
3A-A9-8		X	--	X	--
3A-A9-9		X	X	--	--
3A-A9-10	17-2-32	X	--	X	--
3A-A9-11		X	X	--	--
3A-A9-12	17-2-33	X	--	X	--
3A-A9-13		X	X	--	--
3A-A9-14		X	X	--	--
3A-A9-15	17-2-35 (back)	X	X	--	--
3A-A9-16		X	--	X	--
3A-A9-17		X	X	--	--
3A-A9-18	17-2-36 (back)	X	X	--	--
3A-A9-19		X	--	X	--
3A-A9-20		X	X	--	--
3A-A9-21	17-2-44	X	--	X	--
3A-A9-22		X	X	--	--
3A-A9-23		X	X	--	--
3A-A9-24	17-2-45	X	X	--	--
3A-A9-25		X	--	X	--
3A-A9-26		X	X	--	--
GROUP 3B					
3B-A9-1	17-3-4	Y	Y	--	--
3B-A9-2		Y	--	Y	--
3B-A9-3		Y	Y	--	--
3B-A9-4	17-3-5	X	--	X	--
3B-A9-5		X	X	--	--
3B-A9-6		X	X	--	--
3B-A9-7	17-3-6 (back)	X	X	--	--
3B-A9-8		X	--	X	--
3B-A9-9		X	X	--	--
3B-A9-10	17-3-7 (back)	X	--	X	--
3B-A9-11		X	X	--	--
3B-A9-12		X	X	--	--
3B-A9-13		X	--	X	--
3B-A9-14	17-3-10	X	--	X	--
3B-A9-15		X	X	--	--
3B-A9-16		X	X	--	--
3B-A9-17	17-3-11	X	X	--	--
3B-A9-18		X	--	X	--
3B-A9-19		X	X	--	--

**TABLE 4**  
**SUMMARY OF PROPOSED APPENDIX IX+3 SAMPLING LOCATIONS AND ASSOCIATED DEPTH INTERVALS**  
**INTERIM PDI REPORT ADDENDUM - PHASE 3 FLOODPLAIN PROPERTIES**  
**FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1-1/2 MILE REACH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SAMPLE ID	PARCEL	DEPTH INCREMENT (FEET)			
		0-1	1-3	3-5	5-7
GROUP 3C					
3C-A9-1	I7-2-1	X	--	X	--
3C-A9-2		X	X	--	--
3C-A9-3		X	X	--	--
3C-A9-4	I7-2-2	X	X (See Note 6)	--	--
3C-A9-5		X	--	--	--
3C-A9-6		X	X (See Note 6)	--	--
3C-A9-7	I7-2-3	X	X	--	--
3C-A9-8		X	--	--	--
3C-A9-9		X	X	--	--
3C-A9-10	I7-2-4	X	X (See Note 6)	--	--
3C-A9-11		X	--	--	--
3C-A9-12		X	X (See Note 6)	--	--
3C-A9-13	I7-2-20	X	X	X	--
3C-A9-14		X	--	X	--
3C-A9-15		X	X	--	--
3C-A9-16		X	X	--	X
GROUP 3D					
3D-A9-1	I7-3-1 (back)	X	X	--	--
3D-A9-2		X	--	X	--
3D-A9-3		X	X	--	--
3D-A9-4		X	X	--	--
3D-A9-5		X	--	X	--
3D-A9-6		X	--	--	--
3D-A9-7	I7-99-000 (back)	X	--	X	--
3D-A9-8		X	X	--	--
3D-A9-9		X	X	--	--
3D-A9-10		X	--	X	--
3D-A9-11		X	X	--	--
3D-A9-12		X	X	--	--
3D-A9-13	I7-3-2	X	X	--	--
3D-A9-14		X	--	X	--
3D-A9-15		X	X	--	--

**Notes:**

1. X - Indicates proposed sampling depth for samples to be analyzed for SVOCs, inorganics, and PCDDs/PCDFs.
2. Y - Indicates proposed sampling depth for samples to be held for possible future analysis of above constituents if PCB results indicate need for remediation at this parcel.
3. -- No sample proposed for collection.
4. Proposed sample locations are shown on Figures 5 through 8.
5. Due to ongoing investigations within this evaluation area, the depth of Appendix IX+3 sampling is currently unknown.
6. Since "X" is equal 2 feet below ground surface within this evaluation area, the specified sample will be collected from the 1- to 2-foot depth increment.

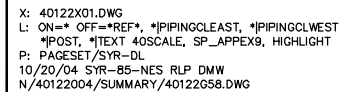


## ***Figures***

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**NOTES TO TABLES:**

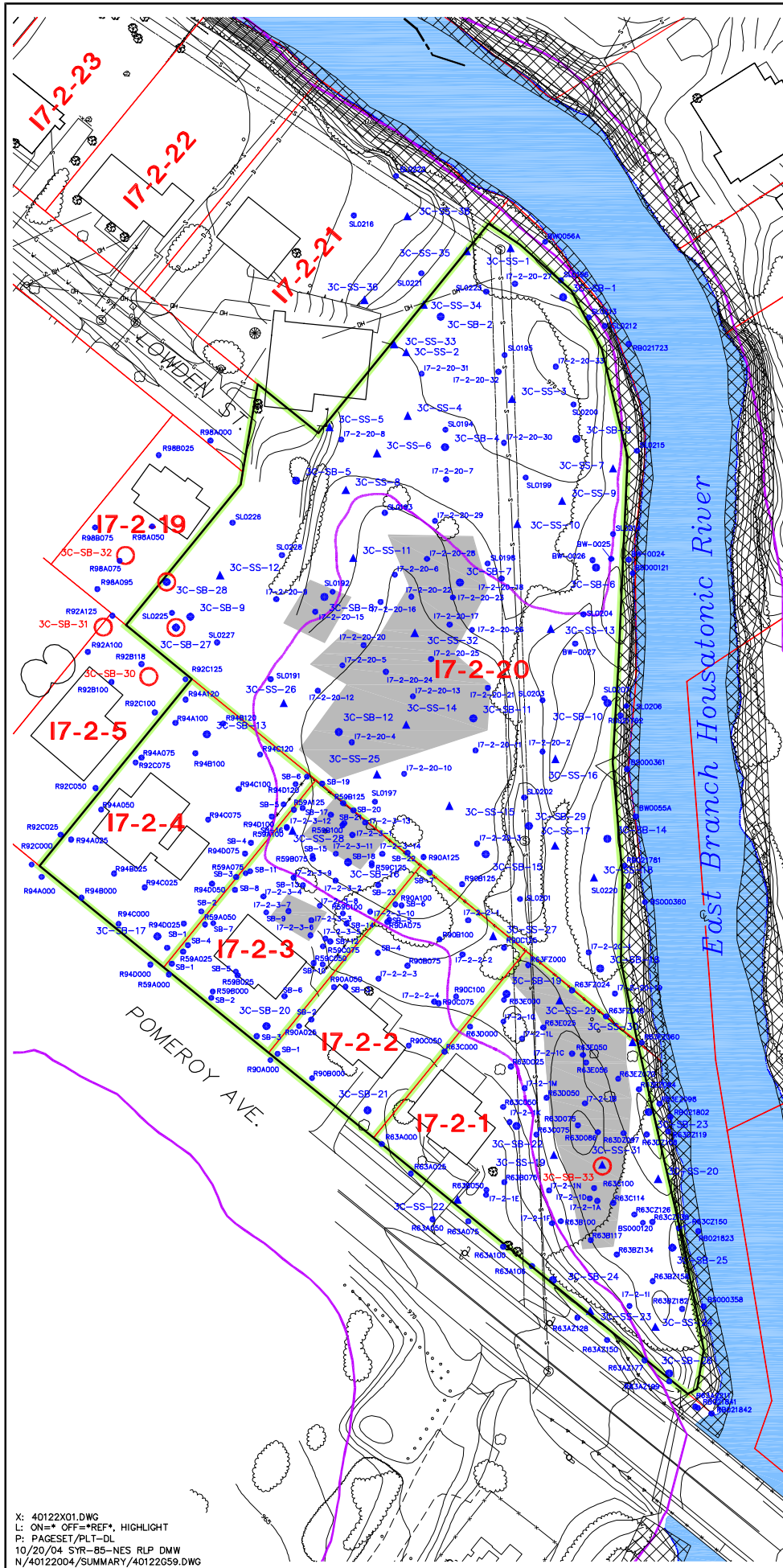
- A. EXISTING SAMPLE DATA OBTAINED FROM EPA DATABASE TITLED  
110703\_USEPA\_HR\_DBASE1.MDB AND GE DATABASE TITLED HR  
121201.MDB.PDI
- B. J = INDICATES ESTIMATED VALUE LESS THAN THE CLP--REQUIRED  
QUANTIFICATION LIMIT.
- C. --- = INDICATES SAMPLE INTERVAL WAS NOT ANALYZED.
- D. DUPLICATE RESULTS PRESENTED IN BRACKETS.
- E. / = SEPARATED RESULTS OF MULTIPLE SAMPLES COLLECTED AT  
THE SPECIFIED LOCATION AND DEPTH INTERVAL ON SEPARATE  
OCCASIONS.

**NOTES TO FIGURE:**

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM PHASEI(BASE.I- AND DAMES TO CONFLUENCE - BASE MAP - CAD 2000/DIG BY WESTON SOLUTIONS FOR THE DEPARTMENT OF THE ARMY CORPS OF ENGINEERS DATED 1/15/03, AND 12/11/03, RESPECTIVELY.
2. PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIEL TAX ASSESSORS' INFORMATION AND ARE APPROXIMATE.
3. THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AVAILABLE TOPOGRAPHIC MAPPING.
4. PCB CONCENTRATIONS ARE REPORTED AS DRY WEIGHT PARTS PER MILLION,







LEGEND:

- APPROXIMATE 10 YEAR FLOODPLAIN
- APPROXIMATE PARCEL BOUNDARY
- APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
- FENCELINE
- 17-2-4 RESIDENTIAL PROPERTY PARCEL ID
- R90C100 EXISTING SOIL BORING LOCATION
- 3C-SS-1 EXISTING SURFACE SOIL SAMPLE LOCATION
- 3C-SB-32 PROPOSED SOIL BORING LOCATION
- BOUNDARY OF FLOODPLAIN PROPERTIES
- AREA TO BE ADDRESSED BY EPA IN 1/2 MILE REACH REMOVAL AREA
- AREA OF PRIOR EXCAVATION (TO DEPTHS RANGING BETWEEN 0.5 AND 1.0 FEET)
- DRAIN LINE
- GAS LINE
- OVERHEAD ELECTRIC
- SANITARY SEWER LINE
- WATER LINE

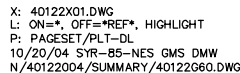
SUMMARY OF PDI PCB SOIL SAMPLE RESULTS  
(RESULTS ARE PRESENT AS DRY WEIGHT PARTS PER MILLION, PPM)  
(SAMPLE INCREMENTS IN FEET BELOW GROUND SURFACE)

Sample ID	PDI GE SAMPLE RESULTS				
	0-1	1-2	2-4	4-6	6-10
3C-SS-1	5.3				
3C-SS-2	2.5 (2.27)				
3C-SS-3	4.8				
3C-SS-4	5.9				
3C-SS-5	5.1				
3C-SS-6	4.0				
3C-SS-7	5.1				
3C-SS-8	5.1				
3C-SS-9	5.1				
3C-SS-10	4.0				
3C-SS-11	8.4				
3C-SS-12	1.7				
3C-SS-13	6.8				
3C-SS-14	1.1				
3C-SS-15	6.9				
3C-SS-16	3.8				
3C-SS-17	4.9				
3C-SS-18	6.2				
3C-SS-19	0.68				
3C-SS-20	103				
3C-SS-21	0.39				
3C-SS-22	0.042				
3C-SS-23	0.25				
3C-SS-24	0.25				
3C-SS-25	15.7				
3C-SS-26	1.6				
3C-SS-27	0.042				
3C-SS-28	0.042				
3C-SS-29	0.042				
3C-SS-30	0.042				
3C-SS-31	0.042				
3C-SS-32	0.042				
3C-SS-33	17.4				
3C-SS-34	1.6				
3C-SS-35	2.2				
3C-SS-36	0.042				
3C-SS-37	0.042				
3C-SS-38	0.042				
3C-SS-39	0.042				
3C-SS-40	0.042				
3C-SS-41	0.042				
3C-SS-42	0.042				
3C-SS-43	0.042				
3C-SS-44	0.042				
3C-SS-45	0.042				
3C-SS-46	0.042				
3C-SS-47	0.042				
3C-SS-48	0.042				
3C-SS-49	0.042				
3C-SS-50	0.042				
3C-SS-51	0.042				
3C-SS-52	0.042				
3C-SS-53	0.042				
3C-SS-54	0.042				
3C-SS-55	0.042				
3C-SS-56	0.042				
3C-SS-57	0.042				
3C-SS-58	0.042				
3C-SS-59	0.042				
3C-SS-60	0.042				
3C-SS-61	0.042				
3C-SS-62	0.042				
3C-SS-63	0.042				
3C-SS-64	0.042				
3C-SS-65	0.042				
3C-SS-66	0.042				
3C-SS-67	0.042				
3C-SS-68	0.042				
3C-SS-69	0.042				
3C-SS-70	0.042				
3C-SS-71	0.042				
3C-SS-72	0.042				
3C-SS-73	0.042				
3C-SS-74	0.042				
3C-SS-75	0.042				
3C-SS-76	0.042				
3C-SS-77	0.042				
3C-SS-78	0.042				
3C-SS-79	0.042				
3C-SS-80	0.042				
3C-SS-81	0.042				
3C-SS-82	0.042				
3C-SS-83	0.042				
3C-SS-84	0.042				
3C-SS-85	0.042				
3C-SS-86	0.042				
3C-SS-87	0.042				
3C-SS-88	0.042				
3C-SS-89	0.042				
3C-SS-90	0.042				
3C-SS-91	0.042				
3C-SS-92	0.042				
3C-SS-93	0.042				
3C-SS-94	0.042				
3C-SS-95	0.042				
3C-SS-96	0.042				
3C-SS-97	0.042				
3C-SS-98	0.042				
3C-SS-99	0.042				
3C-SS-100	0.042				

SUMMARY OF PRIOR PCB SOIL SAMPLE RESULTS  
(RESULTS ARE PRESENT AS DRY WEIGHT PARTS PER MILLION, PPM)  
(SAMPLE INCREMENTS IN FEET BELOW GROUND SURFACE)

PRIOR EPA SAMPLE RESULTS												
Sample Name	0 - 0.08	0 - 0.5	0.5 - 1	1 - 1.5	1.5 - 2	2 - 2.5	3 - 3.5	3 - 4	4 - 4.5	4.5 - 5.5	5.5 - 6	6 - 6.5
BW000180	---	---	---	---	---	---	---	---	---	---	---	---
BW000181	---	---	---	---	---	---	---	---	---	---	---	---
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BW000286	---	---	---	---	---	---	---	---	---	---	---	---
BW000287	---	---	---	---	---	---	---	---	---	---	---	---
BW000288	---	---	---	---	---	---	---	---	---	---	---	---
BW000289	---	---	---	---	---	---	---	---	---	---	---	---
BW000290	---	---	---	---	---	---	---	---	---	---	---	---
BW000291	---	---	---	---	---	---	---	---	---	---	---	---
BW000292	---	---	---	---	---	---	---	---	---	---	---	---
BW000293	---	---	---	---	---	---	---	---	---	---	---	---
BW000294	---	---	---	---	---	---	---	---	---	---	---	---
BW000295	---	---	---	---	---	---	---	---	---	---	---	---
BW000296	---	---	---	---	---	---	---	---	---	---	---	---
BW000297	---	---	---	---	---	---	---	---	---	---	---	---
BW000298	---	---	---	---	---	---	---	---	---	---	---	---
BW000299	---	---	---	---	---	---	---	---	---	---	---	---
BW000300	---	---	---	---	---	---	---	---	---	---	---	---
BW000301	---	---	---	---	---	---	---	---	---	---	---	---
BW000302	---	---	---	---	---	---	---	---	---	---	---	---
BW000303	---	---	---	---	---	---	---	---	---	---	---	---
BW000304	---	---	---	---	---	---	---	---	---	---	---	---
BW000305	---	---	---	---	---	---	---	---	---	---	---	---
BW000306	---	---	---	---	---	---	---	---	---	---	---	---
BW000307	---	---	---	---	---	---	---	---	---	---	---	---
BW000308	---	---	---	---	---	---	---	---	---	---	---	---
BW000309	---	---	---	---	---	---	---	---	---	---	---	---
BW000310	---	---	---	---	---	---	---	---	---	---	---	---
BW000311	---	---	---	---	---	---	---	---	---	---	---	---
BW000312	---	---	---	---	---	---	---	---	---	---	---	---
BW000313	---	---	---	---	---	---	---	---	---	---	---	---
BW000314	---	---	---	---	---	---	---	---	---	---	---	---
BW000315	---	---	---	---	---	---	---	---	---	---	---	---
BW000316	---	---	---	---	---	---	---	---	---	---	---	---
BW000317	---	---	---	---	---	---	---	---	---	---	---	---
BW000318	---	---	---	---	---	---	---	---	---	---	---	---
BW000319	---	---	---	---	---	---	---	---	---	---	---	---
BW000320	---	---	---	---	---	---	---	---	---	---	---	---
BW000321	---	---	---	---	---	---	---	---	---	---	---	---
BW000322	---	---	---	---	---	---	---	---	---	---	---	---
BW000323	---	---	---	---	---	---	---	---	---	---	---	---
BW000324	---	---	---	---	---	---	---	---	---	---	---	---
BW000325	---	---	---	---	---	---	---	---	---	---	---	---
BW000326	---	---	---	---	---	---	---	---	---	---	---	---
BW000327	---	---	---	---	---	---	---	---	---	---	---	---
BW000328	---	---	---	---	---	---	---	---	---	---	---	---
BW000329	---	---	---	---	---	---	---	---	---	---	---	---
BW000330	---	---	---	---	---	---	---	---	---	---	---	---
BW000331	---	---	---	---	---	---	---	---	---	---	---	---
BW000332	---	---	---	---	---	---	---	---	---	---	---	---
BW000333	---	---	---	---	---	---	---	---	---	---	---	---
BW000334	---	---	---	---	---	---	---	---	---	---	---	---
BW000335	---	---	---	---	---	---	---	---	---	---	---	---
BW000336	---	---	---	---	---	---	---	---	---	---	---	---
BW000337	---	---	---	---	---	---	---	---	---	---	---	---
BW000338	---	---	---	---	---	---	---	---	---	---	---	---
BW000339	---	---	---	---	---	---	---	---	---	---	---	---
BW000340	---	---	---	---	---	---	---	---	---			





**NOTES TO TABLES:**











A. SAMPLE DATA OBTAINED FROM EPA DATABASE TITLED 110703  
\_USEPA\_HR\_DBASE1.MDB AND GE DATABASE TITLED HR 121201.MDB

B. J = INDICATES ESTIMATED VALUE LESS THAN THE CLP-REQUIRED  
QUANTIFICATION LIMIT.

C. --- = INDICATES SAMPLE INTERVAL WAS NOT ANALYZED.

D. DUPLICATE RESULTS PRESENTED IN BRACKETS.

**LEGEND**

-  APPROXIMATE 10 YEAR FLOODPLAIN
-  APPROXIMATE PARCEL BOUNDARY
-  APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
-  FENCELINE
- 17-3-2** RESIDENTIAL SURFACE PARCEL ID
-  R970050 EXISTING SOIL BORING LOCATION
-  30-SS-1 EXISTING SURFACE SOIL SAMPLE LOCATION
-  30-SS-23 PROPOSED SURFACE SOIL LOCATION
-  30-SB-26 PROPOSED SOIL BORING LOCATION
-  BOUNDARY OF FLOODPLAIN PROPERTIES
-  AREA TO BE ADDRESSED BY EPA IN 1 $\frac{1}{2}$  MILE REACH REMOVAL AREA
-  AREA OF PRIOR EXCAVATION (TO DEPTHS RANGING BETWEEN 0.5 AND 1.25 FEET)

**NOTES TO FIGURE:**

THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM PHASE1BASE.DWG  
DATE 1/15/03 TO ATTACHMENT - EASE MAP - CAD 2000.DWG BY WESTON  
SOLUTIONS FOR THE DEPARTMENT OF THE ARMY CORPS OF ENGINEERS DATED  
1/15/03, AND 12/11/03, RESPECTIVELY.

PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD  
TAX ASSESSORS' INFORMATION AND ARE APPROXIMATE.

THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING  
HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994)  
AND AVAILABLE TOPOGRAPHIC MAPPING.

PCB CONCENTRATIONS ARE REPORTED AS DRY WEIGHT PARTS PER MILLION,  
PPM.

## SUMMARY OF PCB ANALYTICAL RESULTS AND PROPOSED PCB SAMPLE LOCATIONS FOR GROUP 3D





- LEGEND:
- APPROXIMATE 10 YEAR FLOODPLAIN
  - APPROXIMATE PARCEL BOUNDARY
  - APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
  - FENCELINE
  - RESIDENTIAL PROPERTY PARCEL ID
  - EXISTING SOIL BORING LOCATION
  - PROPOSED APPENDIX IX+3 SURFACE SOIL SAMPLE LOCATION (DEPTH MAY BE EXTENDED BASED ON PCB SAMPLING RESULTS FROM THIS PARCEL)
  - PROPOSED APPENDIX IX+3 SOIL BORING LOCATION
  - BOUNDARY OF FLOODPLAIN PROPERTIES
  - AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
  - DRAIN LINE
  - GAS LINE
  - OVERHEAD ELECTRIC
  - SANITARY SEWER LINE
  - WATER LINE

- NOTES:
- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM PHASEIIBASE.DWG AND DAWES TO CONFLUENCE - BASE MAP - CAD 2000.DWG BY WESTON SOLUTIONS FOR THE DEPARTMENT OF THE ARMY CORPS OF ENGINEERS DATED 1/15/03, AND 12/11/03, RESPECTIVELY.
  - PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION AND ARE APPROXIMATE.
  - THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.

GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS  
PHASE 3 FLOODPLAIN PROPERTIES  
INTERIM PDI REPORT ADDENDUM

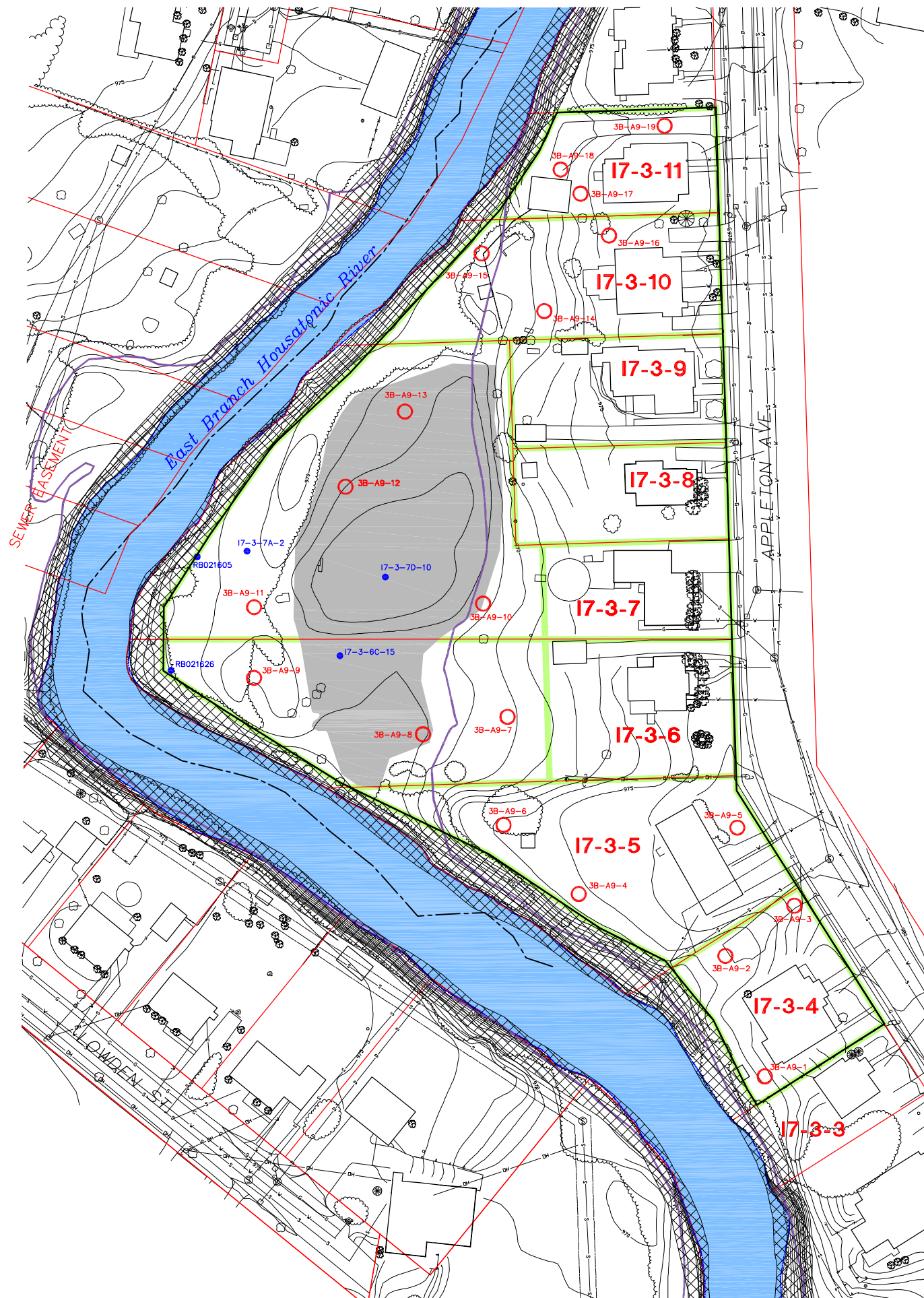
SUMMARY OF EXISTING AND PROPOSED  
APPENDIX IX+3 SOIL SAMPLING  
LOCATIONS FOR GROUP 3A

**BBL**  
BLASLAND, BOUCK & LEE, INC.  
engineers, scientists, economists

FIGURE  
**5**

X: 40122X01.DWG  
L: ON=\*, OFF=REF\*, IPIPINGCLEAST, IPIPINGCLWEST  
JTEXT 40SCALE, SP\_APPX9  
P: PAGESET/PLT-DL  
10/20/04 SYR-B5-DMJ DMW DJP  
N/40122004/INTERIM/40122G14.DWG

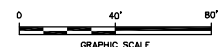




- LEGEND:
- APPROXIMATE 10 YEAR FLOODPLAIN
  - APPROXIMATE PARCEL BOUNDARY
  - APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
  - FENCELINE
  - RESIDENTIAL PROPERTY PARCEL ID
  - EXISTING SOIL BORING LOCATION
  - PROPOSED APPENDIX IX+3 SOIL BORING LOCATION
  - BOUNDARY OF FLOODPLAIN PROPERTIES
  - AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
  - DRAIN LINE
  - GAS LINE
  - OVERHEAD ELECTRIC
  - SANITARY SEWER LINE
  - WATER LINE

NOTES:

- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM PHASEIBASE.DWG AND DAWES TO CONFLUENCE - BASE MAP CAD 2000.DWG BY WESTON SOLUTIONS FOR THE DEPARTMENT OF THE ARMY CORPS OF ENGINEERS DATED 1/15/03, AND 12/11/03, RESPECTIVELY.
- PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION AND ARE APPROXIMATE.
- THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.



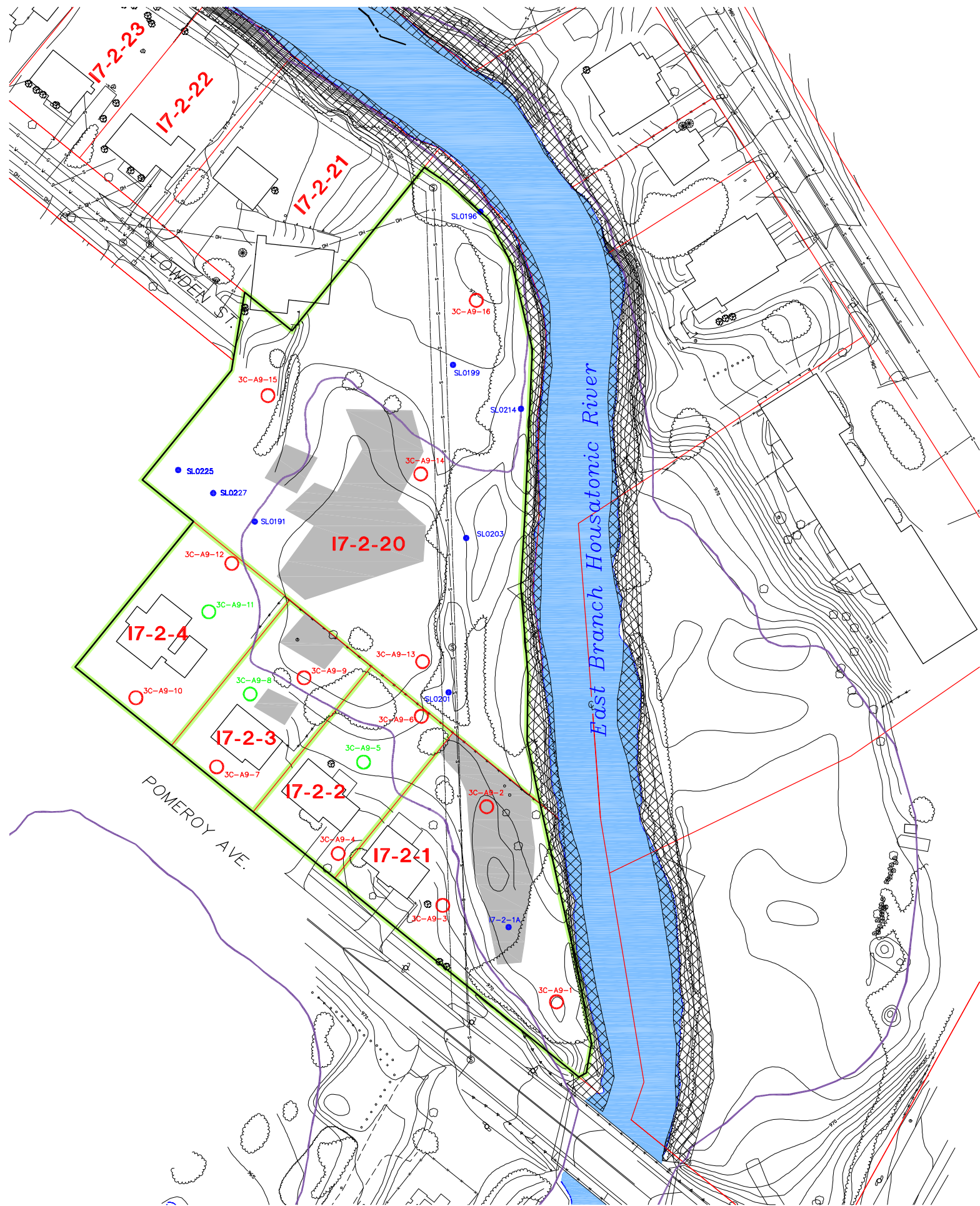
GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS  
PHASE 3 FLOODPLAIN PROPERTIES  
INTERIM PDI REPORT ADDENDUM

SUMMARY OF EXISTING AND PROPOSED  
APPENDIX IX+3 SOIL SAMPLING  
LOCATIONS FOR GROUP 3B

**BBL**  
BLASLAND, BOUCK & LEE, INC.  
engineers, scientists, economists

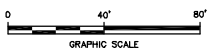
FIGURE  
**6**

X: 40122X01.DWG  
L: ON=\* OFF=\*REF\*, IPIPINGCLEAST, IPIPINGCLWEST  
JTEXT 40SCALE, SP\_APPX9  
P: PAGESET/SYR-DL  
10/20/04 SYR-B5-NES DMW D.J.P  
N/40122004/INTERIM/40122G15.DWG



- LEGEND:
- APPROXIMATE 10 YEAR FLOODPLAIN
  - APPROXIMATE PARCEL BOUNDARY
  - APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
  - FENCELINE
  - 17-2-20 RESIDENTIAL PROPERTY PARCEL ID
  - RB021723 EXISTING SOIL BORING LOCATION
  - 3C-A9-5 PROPOSED APPENDIX IX+3 SURFACE SOIL SAMPLE LOCATION
  - 3C-A9-1 PROPOSED APPENDIX IX+3 SOIL BORING LOCATION
  - BOUNDARY OF FLOODPLAIN PROPERTIES
  - AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
  - DRAIN LINE
  - GAS LINE
  - OVERHEAD ELECTRIC
  - SANITARY SEWER LINE
  - WATER LINE

- NOTES:
- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM PHASEI/BASE.DWG AND DAWES TO CONFLUENCE - BASE MAP - CAD 2000.DWG BY WESTON SOLUTIONS FOR THE DEPARTMENT OF THE ARMY CORPS OF ENGINEERS DATED 1/15/03. AND 12/11/03, RESPECTIVELY.
  - PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION AND ARE APPROXIMATE.
  - THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.

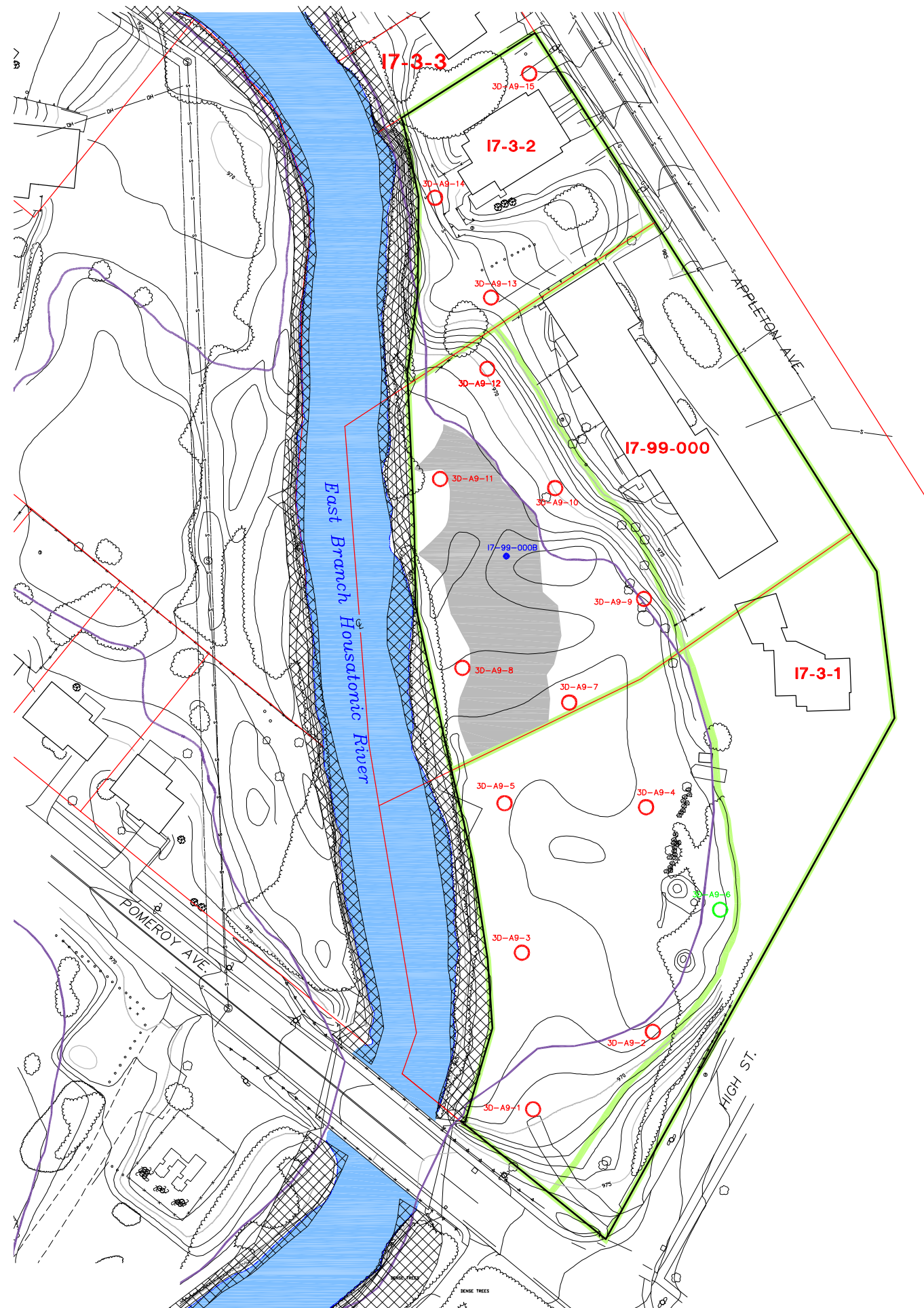


GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS  
PHASE 3 FLOODPLAIN PROPERTIES  
INTERIM PDI REPORT ADDENDUM

SUMMARY OF EXISTING AND PROPOSED  
APPENDIX IX+3 SOIL SAMPLING  
LOCATIONS FOR GROUP 3C







- LEGEND:
- APPROXIMATE 10 YEAR FLOODPLAIN
  - APPROXIMATE PARCEL BOUNDARY
  - APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
  - FENCELINE
  - 17-3-2 RESIDENTIAL PROPERTY PARCEL ID
  - RB021745 EXISTING SOIL BORING LOCATION
  - 3D-A9-6 PROPOSED APPENDIX IX+3 SURFACE SOIL SAMPLE LOCATION
  - 3D-A9-1 PROPOSED APPENDIX IX+3 SOIL BORING LOCATION
  - BOUNDARY OF FLOODPLAIN PROPERTIES
  - AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
  - DRAIN LINE
  - GAS LINE
  - OVERHEAD ELECTRIC
  - SANITARY SEWER LINE
  - WATER LINE

- NOTES:
- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM PHASEIIBASE.DWG AND DAMES TO CONFLUENCE - BASE MAP - CAD 2000.DWG BY WESTON SOLUTIONS FOR THE DEPARTMENT OF THE ARMY CORPS OF ENGINEERS DATED 1/15/03, AND 12/11/03, RESPECTIVELY.
  - PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION AND ARE APPROXIMATE.
  - THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS  
PHASE 3 FLOODPLAIN PROPERTIES  
INTERIM PDI REPORT ADDENDUM

SUMMARY OF EXISTING AND PROPOSED  
APPENDIX IX+3 SOIL SAMPLING  
LOCATIONS FOR GROUP 3D

**BBL**  
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engineers, scientists, economists

FIGURE  
8

X: 40122X01.DWG  
L: ON=\* OFF=\*REF\*, IPIPINGCLEAST, IPIPINGCLWEST  
JTEXT 40SCALE, SP\_APPX9  
P: PAGESET/SYR-DL  
10/20/04 SYR-B5-NES DMW D.J.P  
N/40122004/INTERIM/40122G17.DWG

## ***Appendices***

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## ***Appendix A***

---

### **Soil Boring Logs**

Date Start/Finish: 8/19/04  
 Drilling Company: BBL  
 Driller's Name: RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Slide Hammer  
 Sample Method: 2' Macrocore

Northing: 529300.0  
 Easting: 127487.1  
 Casing Elevation: NA  
 Borehole Depth: 1' below grade  
 Surface Elevation: 975.0  
 Descriptions By: JLL

Boring ID: 3A-SS-20  
 Client: General Electric Company  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

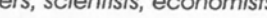
DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0	975	1	0-1	1.0	0.0	HHHHHHHHHH	Dark brown TOPSOIL, trace Organic Material (Roots), moist.	Borehole backfilled with Bentonite
5	970							
10	965							
15	960							



Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1'; PCBs.



**Boring ID:** 3A-SS-21  
**Client:** General Electric Company  
**Location:** Housatonic River 1 1/2 Mile  
Flood Plain Properties

 <p><b>BBL</b><sup>®</sup>          BLASLAND, BOUCK &amp; LEE, INC.  <i>engineers, scientists, economists</i></p>	<p><b>Remarks:</b> bgs = below ground surface; NA = Not Applicable/Available          Analyses: 0-1': PCBs;          MS/MSD collected (PCBs, 0-1').</p>
--	---

**Boring ID:** 3A-SS-22  
**Client:** General Electric Company  
**Location:** Housatonic River 1 1/2 Mile  
Flood Plain Properties

**Remarks:** bgs = below ground surface; NA = Not Applicable/Available  
Analyses: 0-1': PCBs;  
Duplicated Sample ID: 3A-DUP-7 (PCBs, 0-1').

Date Start/Finish: 8/19/04  
 Drilling Company: BBL  
 Driller's Name: RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Slide Hammer  
 Sample Method: 2' Macrocore

Northing: 529250.2  
 Easting: 127548.8  
 Casing Elevation: NA  
 Borehole Depth: 1' below grade  
 Surface Elevation: 971.7  
 Descriptions By: JLL


Boring ID: 3A-SS-23  
 Client: General Electric Company  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties


DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0		1	0-1	1.0	0.0	Dark brown LOAM, trace Organic Material (Roots). [TOPSOIL] BRICK.		Borehole backfilled with Bentonite
970								
5								
965								
10								
960								
15								



Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1': PCBs.  
 Weston oversight provided by Rich Totino.

<b>Date Start/Finish:</b> 8/23/04 <b>Drilling Company:</b> BBL <b>Driller's Name:</b> JAB <b>Drilling Method:</b> Direct Push <b>Auger Size:</b> NA <b>Rig Type:</b> Track-mounted Power Probe <b>Sample Method:</b> 4' Macrocore	<b>Northing:</b> 529234.9 <b>Easting:</b> 127599.2 <b>Casing Elevation:</b> NA  <b>Borehole Depth:</b> 4' below grade <b>Surface Elevation:</b> 957.8  <b>Descriptions By:</b> JJB	<b>Boring ID:</b> 3A-SB-27  <b>Client:</b> General Electric Company  <b>Location:</b> Housatonic River 1 1/2 Mile Flood Plain Properties
---	---	---

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
960								
0							Preprobe to 2 feet.	
955		1	2-4	2.0	0.0	x x x x x x x x x x x	Brown fine SAND, little Brick/Concrete. [FILL]	 Borehole backfilled with Bentonite
5								
950								
10								
945								
15								

 <b>BLASLAND, BOUCK &amp; LEE, INC.</b> <i>engineers, scientists, economists</i>	<b>Remarks:</b> bgs = below ground surface; NA = Not Applicable/Available Analyses: 2-4': PCBs.
---	--



**Boring ID:** 3A-SB-28  
**Client:** General Electric Company  
**Location:** Housatonic River 1 1/2 Mile  
Flood Plain Properties

<div style="display: flex; align-items: center;"> <div style="font-size: 48pt; font-weight: bold; margin-right: 10px;">BBL</div> <div style="font-size: 24pt; font-weight: normal;">®</div> </div> <div style="margin-top: 5px;"> <u>BLASLAND, BOUCK &amp; LEE, INC.</u>  <i>engineers, scientists, economists</i> </div>	<p><b>Remarks:</b> bgs = below ground surface; NA = Not Applicable/Available</p> <p>Analyses: 1-2': PCBs; 2-4': PCBs.</p>
---	---

Date Start/Finish: 8/23/04  
 Drilling Company: BBL  
 Driller's Name: JAB  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Track-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 529524.4  
 Easting: 127475.2  
 Casing Elevation: NA  
 Borehole Depth: 2' below grade  
 Surface Elevation: 980.8  
 Descriptions By: JJB

Boring ID: 3A-SB-29  
 Client: General Electric Company  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0							Preprobe to 1 foot.	
980		1	1-2	1.0	0.0		Dark brown fine SAND and SILT, trace Organic Material.	 Borehole backfilled with Bentonite
5								
975								
10								
970								
15								
965								

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 1-2': PCBs.



Date Start/Finish: 8/23/04  
 Drilling Company: BBL  
 Driller's Name: JAB  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Track-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 529668.3  
 Easting: 127885.6  
 Casing Elevation: NA  
  
 Borehole Depth: 6' below grade  
 Surface Elevation: 989.1  
  
 Descriptions By: JJB

Boring ID: 3A-SB-30  
 Client: General Electric Company  
  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
990								
0							Preprobe to 2 feet.	
		1	2-4		0.0		Dark brown fine SAND and SILT, trace fine to medium Gravel, moist.	
985				3.2			Same as above, little Brick and fine to coarse Gravel.	
5		2	4-6		0.0			Borehole backfilled with Bentonite
980								
10								
975								
15								

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 2-4': PCBs; 4-6': PCBs.

Date Start/Finish: 8/24/04  
 Drilling Company: BBL  
 Driller's Name: JAB,RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Tractor-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 529045.6  
 Easting: 128007.0  
 Casing Elevation: NA


Borehole Depth: 8' below grade  
 Surface Elevation: 974.4

Descriptions By: JJB

Boring ID: 3B-SB-26

Client: General Electric Company

Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	P/D Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
975								
970							Preprobe to 6 feet.	
5		1	6-8	2.0	0.0		Brown fine SAND and SILT, some fine to coarse Gravel, moist.	Borehole backfilled with Bentonite
965								
10								
960								
15								

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 BLASLAND, BOUCK & LEE, INC.  
 engineers, scientists, economists

Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 6-8': PCBs;  
 MS/MSD collected (PCBs, 6-8').

<b>Date Start/Finish:</b> 8/24/04 <b>Drilling Company:</b> BBL <b>Driller's Name:</b> JAB,RCD <b>Drilling Method:</b> Direct Push <b>Auger Size:</b> NA <b>Rig Type:</b> Tractor-mounted Power Probe <b>Sample Method:</b> 4' Macrocore	<b>Northing:</b> 529017.5 <b>Easting:</b> 128022.3 <b>Casing Elevation:</b> NA  <b>Borehole Depth:</b> 8' below grade <b>Surface Elevation:</b> 971.3  <b>Descriptions By:</b> JJB	<b>Boring ID:</b> 3B-SB-27  <b>Client:</b> General Electric Company  <b>Location:</b> Housatonic River 1 1/2 Mile Flood Plain Properties
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DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0	970						Preprobe to 3 feet.	
		1	3-4	1.0	0.0	x x x x	COAL/ASH. [FILL]	
5		2	4-6		0.0	x x x x x x	Brown fine to medium SAND, some fine to medium Gravel, trace Coal/Ash. [FILL]	
965		3	6-8	2.7	0.0	x x x x x x		Borehole backfilled with Bentonite
10	960							
15								

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**Remarks:** bgs = below ground surface; NA = Not Applicable/Available

Analyses: 3-4': PCBs; 4-6': PCBs; 6-8': PCBs;

Duplicate Sample ID: 3B-DUP-8 (PCBs, 3-4').

Date Start/Finish: 8/24/04  
 Drilling Company: BBL  
 Driller's Name: JAB,RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Tractor-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 529047.5  
 Easting: 128062.9  
 Casing Elevation: NA



Borehole Depth: 3' below grade  
 Surface Elevation: 974.3

Descriptions By: JJB

Boring ID: 3B-SB-28

Client: General Electric Company

Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
975								
0							Preprobe to 2 feet.	
		1	2-3	1.0	0.0		Light brown fine SAND, moist.	 Borehole backfilled with Bentonite
970								
5								
965								
10								
960								
15								



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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 2-3': PCBs.

Date Start/Finish: 8/24/04  
 Drilling Company: BBL  
 Driller's Name: JAB,RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Tractor-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 529006.5  
 Easting: 128056.9  
 Casing Elevation: NA  
 Borehole Depth: 3' below grade  
 Surface Elevation: 975.4  
 Descriptions By: JJB

Boring ID: 3B-SB-29  
 Client: General Electric Company  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0	975						Preprobe to 2 feet.	
		1	2-3	1.0	0.0		Orange-brown fine to medium SAND, moist.	 Borehole backfilled with Bentonite
5	970							
10	965							
15	960							


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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 2-3': PCBs.

Date Start/Finish: 8/24/04  
 Drilling Company: BBL  
 Driller's Name: JAB,RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Tractor-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 529209.5  
 Easting: 127735.0  
 Casing Elevation: NA  
 Borehole Depth: 8' below grade  
 Surface Elevation: 983.6  
 Descriptions By: JJB

Boring ID: 3B-SB-31  
 Client: General Electric Company  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
985								
980							Preprobe to 6 feet.	
5								
		1	6-8	2.0	0.0	x x x x x x x x x x	Dark brown fine SAND and SILT, some Coal/Ash. [FILL]	 Borehole backfilled with Bentonite
975								
10								
970								
15								

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 6-8': PCBs.



Date Start/Finish: 8/19/04  
 Drilling Company: BBL  
 Driller's Name: RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Slide Hammer  
 Sample Method: 2' Macrocore

Northing: 528885.4  
 Easting: 127903.5  
 Casing Elevation: NA  
  
 Borehole Depth: 1' below grade  
 Surface Elevation: 968.4  
  
 Descriptions By: JLL

Boring ID: 3C-SS-33  
 Client: General Electric Company  
  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
970								
0		1	0-1	1.0	0.0		Dark brown SILT and SAND, trace Organic Material, moist. [TOPSOIL] Light brown fine SAND and SILT, moist. [FILL]	 Borehole backfilled with Bentonite
965								
5								
960								
10								
955								
15								



Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1': PCBs.

Date Start/Finish: 8/19/04  
 Drilling Company: BBL  
 Driller's Name: RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Slide Hammer  
 Sample Method: 2' Macrocore

Northing: 528906.0  
 Easting: 127918.9  
 Casing Elevation: NA

Borehole Depth: 1' below grade  
 Surface Elevation: 968.9

Descriptions By: JLL

Boring ID: 3C-SS-34

Client: General Electric Company

Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headpace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
970								
0		1	0-1	1.0	0.0	x x x x x x	Light brown fine GRAVEL, trace Organic Material, moist. [FILL]	Borehole backfilled with Bentonite
965								
5								
960								
10								
955								
15								

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1': PCBs.

Date Start/Finish: 8/19/04  
 Drilling Company: BBL  
 Driller's Name: RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Slide Hammer  
 Sample Method: 2' Macrocore

Northing: 528933.7  
 Easting: 127941.1  
 Casing Elevation: NA

Borehole Depth: 1' below grade  
 Surface Elevation: 968.7

Descriptions By: JLL

Boring ID: 3C-SS-35

Client: General Electric Company

Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
970								
0		1	0-1	1.0	0.0	Dark brown fine SAND and SILT, trace Organic Material, moist. [TOPSOIL]		Borehole backfilled with Bentonite
965								
5								
960								
10								
955								
15								

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1': PCBs.

<b>Date Start/Finish:</b> 8/20/04 <b>Drilling Company:</b> BBL <b>Driller's Name:</b> RCD <b>Drilling Method:</b> Direct Push <b>Auger Size:</b> NA <b>Rig Type:</b> Slide Hammer <b>Sample Method:</b> 2' Macrocore	<b>Northing:</b> 528908.3 <b>Easting:</b> 127888.1 <b>Casing Elevation:</b> NA  <b>Borehole Depth:</b> 1' below grade <b>Surface Elevation:</b> 970.6  <b>Descriptions By:</b> JLL	<b>Boring ID:</b> 3C-SS-36  <b>Client:</b> General Electric Company  <b>Location:</b> Housatonic River 1 1/2 Mile Flood Plain Properties
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DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0	970	1	0-1	1.0	0.0		Dark brown fine SAND and SILT, trace Organic Material, moist. [TOPSOIL]	
5	965							
10	960							
15	955							





**Remarks:** bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1': PCBs.

Date Start/Finish: 8/20/04  
 Drilling Company: BBL  
 Driller's Name: RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Slide Hammer  
 Sample Method: 2' Macrocore

Northing: 528951.7  
 Easting: 127910.4  
 Casing Elevation: NA  
 Borehole Depth: 1' below grade  
 Surface Elevation: 971.9  
 Descriptions By: JLL

Boring ID: 3C-SS-38  
 Client: General Electric Company  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0		1	0-1	1.0	0.0		Dark brown fine SAND and SILT, trace Organic Material (Roots), fine Pebbles.	 Borehole backfilled with Bentonite
970								
5								
965								
10								
960								
15								

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1': PCBs.

Date Start/Finish: 8/23/04  
 Drilling Company: BBL  
 Driller's Name: JAB,RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Track-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 528739.3  
 Easting: 127790.5  
 Casing Elevation: NA  
  
 Borehole Depth: 4' below grade  
 Surface Elevation: 972.5  
  
 Descriptions By: JJB

Boring ID: 3C-SB-27  
  
 Client: General Electric Company  
  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
975								
0							Preprobe to 2 feet.	
970		1	2-4	2.0	0.0	x x x x x x x	Dark brown SILT and fine SAND, some Coal/Ash, moist. [FILL]	Borehole backfilled with Bentonite
5								
965								
10								
960								
15								

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 2-4': PCBs.



Date Start/Finish: 8/23/04  
 Drilling Company: BBL  
 Driller's Name: JAB,RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Track-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 528762.9  
 Easting: 127785.7  
 Casing Elevation: NA  
 Borehole Depth: 4' below grade  
 Surface Elevation: 977.4  
 Descriptions By: JJB

Boring ID: 3C-SB-28  
 Client: General Electric Company  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
980								
0							Preprobe to 2 feet.	
975		1	2-4	1.4	0.0		Light brown fine SAND, trace Organic Material, moist.	 Borehole backfilled with Bentonite
5								
970								
10								
965								
15								

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 2-4': PCBs.

Date Start/Finish: 8/23/04  
 Drilling Company: BBL  
 Driller's Name: JAB,RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Track-mounted Power Probe  
 Sample Method: 4' Macrocore

Northing: 528636.5  
 Easting: 127973.4  
 Casing Elevation: NA



Borehole Depth: 8' below grade  
 Surface Elevation: 960.9

Descriptions By: JJB

Boring ID: 3C-SB-29

Client: General Electric Company

Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0	960						Preprobe to 6 feet.	
5	955	1	6-8	2.0	0.0		Light brown fine SAND and SILT, trace Organic Material, moist.	 Borehole backfilled with Bentonite
10	950							
15	945							

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 6-8': PCBs.

Date Start/Finish: 8/19/04  
 Drilling Company: BBL  
 Driller's Name: RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Slide Hammer  
 Sample Method: 2' Macrocore

Northing: 528903.7  
 Easting: 128097.2  
 Casing Elevation: NA

Borehole Depth: 1' below grade  
 Surface Elevation: 976.7

Descriptions By: JLL

Boring ID: 3D-SS-21

Client: General Electric Company

Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0		1	0-1	1.0	0.0		Fine SAND, some Gravel, trace Organic Material. [TOPSOIL and FILL]	Borehole backfilled with Bentonite
975								
5								
970								
10								
965								
15								



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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1': PCBs.

Date Start/Finish: 8/19/04  
 Drilling Company: BBL  
 Driller's Name: RCD  
 Drilling Method: Direct Push  
 Auger Size: NA  
 Rig Type: Slide Hammer  
 Sample Method: 2' Macrocore

Northing: 528854.1  
 Easting: 128220.2  
 Casing Elevation: NA  
 Borehole Depth: 1' below grade  
 Surface Elevation: 982.2  
 Descriptions By: JLL

Boring ID: 3D-SS-22  
 Client: General Electric Company  
 Location: Housatonic River 1 1/2 Mile  
 Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
985								
0		1	0-1	1.0	0.0		Fine SAND, trace Organic Material, moist. [TOPSOIL] Dark brown fine SAND and SILT, moist. [FILL]	 Borehole backfilled with Bentonite
980								
5								
975								
10								
970								
15								





**Remarks:** bgs = below ground surface; NA = Not Applicable/Available  
 Analyses: 0-1': PCBs.

Date Start/Finish: 8/24/04  
Drilling Company: BBL  
Driller's Name: JAB,RCD  
Drilling Method: Direct Push  
Auger Size: NA  
Rig Type: Slide Hammer  
Sample Method: 2' Macrocore

Northing: 528258.3  
Easting: 128230.9  
Casing Elevation: NA  
Borehole Depth: 2' below grade  
Surface Elevation: 975.2  
Descriptions By: JJB

Boring ID: 3D-SB-25  
Client: General Electric Company  
Location: Housatonic River 1 1/2 Mile  
Flood Plain Properties

DEPTH	ELEVATION	Sample Run Number	Sample/Int/Type	Recovery (feet)	PID Headspace (ppm)	Geologic Column	Stratigraphic Description	Boring Construction
0	975						Preprobe to 1 foot.	
		1	1-2	1.0	0.0		Dark brown SILT, some Organic Material.	 Borehole backfilled with Bentonite
5	970							
10	965							
15	960							

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Remarks: bgs = below ground surface; NA = Not Applicable/Available  
Analyses: 1-2': PCBs.

## ***Appendix B***

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# **Data Validation Report**



**APPENDIX B**  
**SUPPLEMENTAL PCB SOIL SAMPLING DATA VALIDATION REPORT**  
**PHASE 3 FLOODPLAIN PROPERTIES**  
**FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES**  
**ADJACENT TO 1-1/2 MILE REACH**

**GENERAL ELECTRIC COMPANY**  
**PITTSFIELD, MASSACHUSETTS**

**1.0 General**

This appendix summarizes the Tier I and Tier II data reviews performed for PCB soil samples collected during supplemental pre-design investigation activities conducted within/adjacent to the Phase 3 properties located adjacent to 1½ Mile Reach, located in Pittsfield, Massachusetts. The samples were analyzed for polychlorinated biphenyls (PCBs) by SGS Environmental Services, Inc. (formerly CT&E) of Charleston, West Virginia. Data validation was performed for 31 samples analyzed for PCBs.

**2.0 Data Evaluation Procedures**

This attachment outlines the applicable quality control criteria utilized during the data review process and any deviations from those criteria. The data review was conducted in accordance with the following documents:

- *Field Sampling Plan/Quality Assurance Project Plan, General Electric Company, Pittsfield, Massachusetts*, Blasland, Bouck & Lee, Inc. (BBL; FSP/QAPP, approved May 25, 2004 and resubmitted June 15, 2004);
- *Region I Tiered Organic and Inorganic Data Validation Guidelines*, USEPA Region I (July 1, 1993);
- *Region I Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses*, USEPA Region I (February 1, 1988) (Modified November 1, 1988); and
- *Region I Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses*, USEPA Region I (Draft, December 1996).

A tabulated summary of the Tier I and Tier II data evaluations is presented in Table B-1. Each sample subject to evaluation is listed in Table B-1 to document that data review was performed, as well as present the highest level of data validation (Tier I or Tier II) that was applied. Samples that required data qualification are listed separately for each parameter (compound or analyte) that required qualification.

The following data qualifiers were used in this data evaluation.

- J     The compound was positively identified, but the associated numerical value is an estimated concentration. This qualifier is used when the data evaluation procedure identifies a deficiency in the data generation process. This qualifier is also used when a compound is detected at an estimated concentration less than the corresponding practical quantitation limit (PQL).
- U     The compound was analyzed for, but was not detected. The sample quantitation limit is presented and adjusted for dilution and (for solid samples only) percent moisture. Non-detect sample results are presented as ND(PQL) within this report and in Table B-1 for consistency with documents previously prepared for investigations conducted at this site.

- UJ The compound was not detected above the reported sample quantitation limit. However, the reported limit is estimated and may or may not represent the actual level of quantitation. Non-detect sample results that required qualification are presented as ND(PQL) J within this report and in Table B-1 for consistency with documents previously prepared for this investigation.
- R Indicates that the previously reported detection limit or sample result has been rejected due to a major deficiency in the data generation procedure. The data should not be used for any qualitative or quantitative purpose.

### **3.0 Data Validation Procedures**

The FSP/QAPP provides (in Section 7.5) that all analytical data will be validated to a Tier I level following the procedures presented in the *Region I Tiered Organic and Inorganic Data Validation Guidelines* (USEPA guidelines). Accordingly, 100% of the analytical data for this investigation was subject to Tier I review. The Tier I review consisted of a completeness evidence audit, as outlined in the *USEPA Region I CSF Completeness Evidence Audit Program* (USEPA Region I, 7/31/91), to ensure that all laboratory data and documentation were present. In the event that data packages were determined to be incomplete, the missing information was requested from the laboratory. Upon completion of the Tier I review, the data packages complied with the USEPA Region I Tier I data completeness requirements. A tabulated summary of the samples subjected to Tier I and Tier II data evaluation is presented in the following table.

**Summary of Samples Subjected to Tier I and Tier II Data Validation**

Parameter	Tier I Only			Tier I & Tier II			Total
	Samples	Duplicates	Blanks	Samples	Duplicates	Blanks	
PCBs	20	1	0	8	1	1	31
<b>Total</b>	<b>20</b>	<b>1</b>	<b>0</b>	<b>8</b>	<b>1</b>	<b>1</b>	<b>31</b>

In the event data packages were determined to be incomplete, the missing information was requested from the laboratory. Upon completion of the Tier I review, the data packages complied with USEPA Region I Tier I data completeness requirements.

As specified in the FSP/QAPP, approximately 25% of the laboratory sample delivery group packages were randomly chosen to be subject to Tier II review. A Tier II review was also performed to resolve data usability limitations identified from laboratory qualification of the data during the Tier I data review. The Tier II data review consisted of a review of all data package summary forms for identification of quality assurance/quality control (QA/QC) deviations and qualification of the data according to the Region I Data Validation Functional Guidelines. Due to the variable sizes of the data packages and the number of data qualification issues identified during the Tier I review, approximately 32% of the data were subject to a Tier II review. The Tier II review resulted in the qualification of data for several samples due to minor QA/QC deficiencies. Additionally, all field duplicates were examined for relative percent difference (RPD) compliance with the criteria specified in the FSP/QAPP.

### **4.0 Data Review**

Based on the USEPA Region I Tier II data validation procedures, QA/QC parameter deviations that required sample result qualification were not observed for these data.

## **5.0 Overall Data Usability**

This section summarizes the analytical data in terms of its completeness and usability for site characterization purposes. Data completeness is defined as the percentage of sample results that have been determined to be usable during the data validation process. The percent usability calculation included analyses evaluated under both the Tier I and Tier II data validation reviews. Data completeness with respect to usability was calculated separately for inorganic and each of the organic analysis. The percent usability calculation also includes quality control samples collected to aid in the evaluation of data usability. Therefore, field/equipment blank, trip blank, and field duplicate data determined to be unusable as a result of the validation process are represented in the percent usability value tabulated in the following table.

<b>Data Usability</b>		
<b>Parameter</b>	<b>Percent Usability</b>	<b>Rejected Data</b>
PCBs	100	None

The data package completeness, as determined from the Tier I data review, was used in combination with the data quality deviations identified during the Tier II data review to determine overall data quality. As specified in the FSP/QAPP, the overall precision, accuracy, representativeness, comparability, and completeness (PARCC) parameters determined from the Tier I and Tier II data reviews were used as indicators of overall data quality. These parameters were assessed through an evaluation of the results of the field and laboratory QA/QC sample analyses to provide a measure of compliance of the analytical data with the Data Quality Objectives (DQOs) specified in the FSP/QAPP. Therefore, the following sections present summaries of the PARCC parameters assessment with regard to the DQOs specified in the FSP/QAPP.

### **5.1 Precision**

Precision measures the reproducibility of measurements under a given set of conditions. Specifically, it is a quantitative measure of the variability of a group of measurements compared to their average value. For this investigation, precision was defined as the RPD between duplicate sample results. The duplicate samples used to evaluate precision included field duplicates and matrix spike/matrix spike duplicate (MS/MSD) RPD samples. For this analytical program, none of the data required qualification for field duplicate deviations or MS/MSD RPD deviations.

### **5.2 Accuracy**

Accuracy measures the bias in an analytical system or the degree of agreement of a measurement with a known reference value. For this investigation, accuracy was defined as the percent recovery of QA/QC samples that were spiked with a known concentration of an analyte or compound of interest. The QA/QC samples used to evaluate analytical accuracy included instrument calibration, Laboratory Control Standards (LCSs), MS/MSD samples and surrogate compound recoveries. For this analytical program, none of the data required qualification for instrument calibration deviations, LCS deviations, MS/MSD sample deviations, or surrogate compound recovery deviations.

### **5.3 Representativeness**

Representativeness expresses the degree to which sample data accurately and precisely represents a characteristic of a population, parameter variations at a sampling point, or an environmental condition. Representativeness is a qualitative parameter, which is most concerned with the proper design of the sampling program. The representativeness criterion is best satisfied by making certain that sampling locations are selected properly and a sufficient number of samples are collected. This parameter has been addressed by collecting samples at locations specified in MDEP-approved work plans, and by following

the procedures for sample collection/analyses that were described in the FSP/QAPP. Additionally, the analytical program used procedures consistent with USEPA-approved analytical methodology. A QA/QC parameter that is an indicator of the representativeness of a sample is holding time. Holding time criteria are established to maintain the samples in a state that is representative of the in-situ field conditions before analysis. For this analytical program, none of the data required qualification due to extraction holding time requirements.

#### **5.4 Comparability**

Comparability is a qualitative parameter expressing the confidence with which one data set can be compared with another. This goal was achieved through the use of the standardized techniques for sample collection and analysis presented in the FSP/QAPP. The USEPA SW-846<sup>1</sup> analytical methods presented in the FSP/QAPP are updated on occasion by the USEPA to benefit from recent technological advancements in analytical chemistry and instrumentation. In most cases, the method upgrades include the incorporation of new technology that improves the sensitivity and stability of the instrumentation or allows the laboratory to increase throughput without hindering accuracy and precision. Overall, the analytical methods for this investigation have remained consistent in their general approach through continued use of the basic analytical techniques (e.g., sample extraction/preparation, instrument calibration, QA/QC procedures). Through this use of consistent base analytical procedures and by requiring that updated procedures meet the QA/QC criteria specified in the FSP/QAPP, the analytical data from past, present, and future sampling events will be comparable to allow for qualitative and quantitative assessment of site conditions.

#### **5.5 Completeness**

Completeness is defined as the percentage of measurements that are judged to be valid or usable to meet the prescribed DQOs. The completeness criterion is essentially the same for all data uses -- the generation of a sufficient amount of valid data. The actual completeness of this analytical data had an overall usability of 100%.

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<sup>1</sup> Test Methods for evaluating Solid Waste, SW-846, USEPA, Final Update III, December 1996.

**TABLE B - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**FLOODPLAINS RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1 1/2 MILE REACH**  
**PHASE 3 GROUP 3A, 3B, 3C AND 3D**

**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>PCBs</b>											
4H0P448	3A-DUP-7 (0 - 1)	8/19/2004	Soil	Tier I	No						3A-SS-22
4H0P448	3A-SS-20 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P448	3A-SS-21 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P448	3A-SS-22 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P448	3A-SS-23 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P448	3C-SS-33 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P448	3C-SS-34 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P448	3C-SS-35 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P448	3D-SS-21 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P448	3D-SS-22 (0 - 1)	8/19/2004	Soil	Tier I	No						
4H0P473	3C-SS-36 (0 - 1)	8/20/2004	Soil	Tier I	No						
4H0P473	3C-SS-38 (0 - 1)	8/20/2004	Soil	Tier I	No						
4H0P490	3A-SB-27 (2 - 4)	8/23/2004	Soil	Tier I	No						
4H0P490	3A-SB-28 (1 - 2)	8/23/2004	Soil	Tier I	No						
4H0P490	3A-SB-28 (2 - 4)	8/23/2004	Soil	Tier I	No						
4H0P490	3A-SB-29 (1 - 2)	8/23/2004	Soil	Tier I	No						
4H0P490	3A-SB-30 (2 - 4)	8/23/2004	Soil	Tier I	No						
4H0P490	3A-SB-30 (4 - 6)	8/23/2004	Soil	Tier I	No						
4H0P490	3C-SB-27 (2 - 4)	8/23/2004	Soil	Tier I	No						
4H0P490	3C-SB-28 (2 - 4)	8/23/2004	Soil	Tier I	No						
4H0P490	3C-SB-29 (6 - 8)	8/23/2004	Soil	Tier I	No						
4H0P506	3B-DUP-8 (3 - 4)	8/24/2004	Soil	Tier II	No						3B-SB-27
4H0P506	3B-SB-26 (6 - 8)	8/24/2004	Soil	Tier II	No						
4H0P506	3B-SB-27 (3 - 4)	8/24/2004	Soil	Tier II	No						
4H0P506	3B-SB-27 (4 - 6)	8/24/2004	Soil	Tier II	No						
4H0P506	3B-SB-27 (6 - 8)	8/24/2004	Soil	Tier II	No						
4H0P506	3B-SB-28 (2 - 3)	8/24/2004	Soil	Tier II	No						
4H0P506	3B-SB-29 (2 - 3)	8/24/2004	Soil	Tier II	No						
4H0P506	3B-SB-31 (6 - 8)	8/24/2004	Soil	Tier II	No						
4H0P506	3D-SB-25 (1 - 2)	8/24/2004	Soil	Tier II	No						
4H0P506	RB-082404-1	8/24/2004	Water	Tier II	No						